

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SAUNTORE THOMAS, *an individual*

Plaintiff,

vs.

**ENTERPRISE LEASING
COMPANY OF DETROIT, LLC,**

Defendant.

Case No. 19-cv-11550
Hon. Mark A. Goldsmith
Mag. Mona K. Majzoub

DEBORAH GORDON LAW

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**PLAINTIFF'S AMENDED PRELIMINARY WITNESS AND
EXHIBIT LIST**

Plaintiff Sauntore Thomas, by and through his attorneys, Deborah Gordon Law, hereby submits his amended preliminary list of fact witnesses known to him who participated in, and who he anticipates may testify about, the events comprising his allegations in this case and which are otherwise relevant to this action; as well as his amended preliminary exhibit list.

RESERVATION OF RIGHTS

Plaintiff expressly reserves the right to supplement his Preliminary Witness List up to and including the date of the Joint Pretrial Statement is filed. As discovery has not concluded in this case, Plaintiff may not presently be able to fully to identify all of the witnesses he anticipates calling to testify at the time of trial. Plaintiff accordingly reserves the rights to supplement this Preliminary Witness List to name any fact witnesses about whose knowledge or potential testimony he may become aware during the discovery period of this action, and to rely in these proceedings on the testimony of any such witnesses.

PRELIMINARY WITNESS LIST

Witnesses Expected to be Presented at Trial

1. Plaintiff Sauntore Thomas. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

2. Robert McRae. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected

activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

3. Lauren Adams. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

4. Tyra Sapelak. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

5. Steven Martino. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

6. Amber Williams. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

7. Akia Adams. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

8. Robert Johnson. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

9. Latreese Loving. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

10. Sauda Muhammad. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

11. Rhonda Rusan. C/o Deborah Gordon Law, 33 Bloomfield Hills Pkwy, Bloomfield Hills, MI 48304. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

12. Lauren Cooper. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

13. Sara MacKool. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

14. Melissa Johnson. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected

activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

15. Douglas Allsbrooks. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

16. Brian Conner. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

17. Ross Sanders. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

18. Bradley Anthony. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

19. Shalonda Brown. 313 399-1407. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

20. Keith Campbell. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

21. Cory Goble. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

22. Dominic Gumul. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected

activity; Defendant's discrimination against and harassment of non-white customers.

23. Roderick Thomas. 313 414-1826. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

24. David Tornowski. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

25. Don Moran. [313 520-2859](tel:3135202859), Dmoran299@gmail.com. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

26. Marcus Wilkerson. Current or former employee of Defendant, 248-325-7495. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

27. Malik Akeem. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

28. Diana Booker. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

29. Lataisha Roundtree. 313 778-6214. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

30. Kelly Martin. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

31. Harris Zulfiqar. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

32. Souad (last name unknown). Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

33. John Mayes. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

34. Laura O'Neal. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

35. Jazmine Rubens. 313-778-6214. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

36. Brandon Lilly. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

37. "Tab Turt Carter." Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

38. Grant Green. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

39. Mark Warren. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

40. Rebecca Ditto. Rebeca.e.ditto@ehi.com. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

41. Jami Hicks. 734 444-9736. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

42. All treating and/or examining physicians, psychiatrists, psychologists, and health care professionals for Plaintiff.

43. Keepers of the records for all treating and/or examining physicians, psychiatrists, psychologists, and health care professionals for Plaintiff.

44. Any current or former employees, representatives, agents, record keepers, or contractors of Defendant who may have information pertaining to Plaintiff's claims or Defendants' defenses.

45. All individuals identified and/or referenced in answers to interrogatories, requests for production of documents, depositions, duces tecum notices, initial disclosures, all other discovery produced by any party, and all other pleadings in this case.

46. All witnesses on Defendant's witness lists.

47. Any and all necessary rebuttal lay and expert witnesses, including without limitation any expert witness identified by any party.

48. Any and all witnesses necessary to lay the foundation for the admission of evidence.

49. Any and all witnesses necessary to authenticate, impeach, or rebut.

50. Any and all records keepers.

51. Plaintiff reserves the right to supplement and/or amend this witness list up to and including the date the Joint Final Pretrial Statement is filed.

Witnesses Who May be Called at Trial

1. Abby Wattney. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

2. Patricia Pam. 313 575-7246, Patriciapam75@gmail.com. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

3. Tangynica Anderson. C/o Butzel Long PC, 150 W. Jefferson Ave, Ste. 100, Detroit, MI 48226. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity, including his termination; Defendant's discrimination against and harassment of non-white customers.

4. Kenyada Wade. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

5. Heather Meadows. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

6. Brent Opland. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

7. Michelle Alvarado. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

8. Dejuan Dykes. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

9. John Miller. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

10. Karen Smith. Former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

11. Tonya (last name unknown). Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

12. Anne Shewalter. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

13. Chris Gould. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

14. Jess Cramer. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

15. Nick MacKool. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

16. Sonny Lopez. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

17. Sara Hipple. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

18. Ryan Thistlethwaite. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

19. Delana Joiner. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

20. Jim Stacy. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

21. Jeff Hernandez. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

22. Amy LaGrow. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

23. Bob Binck. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

24. Scott Matzner. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

25. Scott Hauber. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

26. Tonja Rubens. 313 914-9022. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

27. Madinah Teasley. 313 522-1848. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

28. Jeremy Smith. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

29. Darrell Rich. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

30. Damieon Love. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant;

Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

31. Jay Pearson. 734 558-1975. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

32. Jonathan Magnotte. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

33. John Hill. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

34. Charell Mahone. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

35. Peggy Werth-Goth. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

36. Allison Elezi. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

37. Antonio Fagan. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

38. Darien White. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

39. Meah Long. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

40. Sonya Austin. 313 948-2991. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

41. Omar Lakhani. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

42. Daryl Rich. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and

protected activity; Defendant's discrimination against and harassment of non-white customers.

43. Montez Lowry. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

44. Brett Opland. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

45. Brad Balkema. Current or former employee of Defendant, contact information unknown at this time. Plaintiff's employment with Defendant; Defendant's discrimination against and harassment of Plaintiff based on race and protected activity; Defendant's discrimination against and harassment of non-white customers.

46. Plaintiff reserves the right to supplement and/or amend this witness list up to and including the date the Joint Final Pretrial Statement is filed.

PRELIMINARY EXHIBIT LIST

Exhibits Expected to be Offered at Trial

1. Defendants' responses to Plaintiffs' Interrogatories and Requests for Production of Documents;
2. Collective bargaining agreements for 2011-2018;
3. Human resources policies and training regarding harassment, discrimination, hostile work environment, retaliation, and social media usage;
4. All documents concerning the hostile work environment and termination(s) referred to in this case, including Plaintiff's formal complaint, and Defendant's responses to these issues;
5. Records from Defendant, including but not limited to personnel files of Plaintiff, employee files, emails, correspondence, applications, company manuals, policies and procedures, meeting minutes, meeting presentations, and any other documents relating to this matter;
6. All documents that relate to Plaintiff's hiring, employment performance, pay, benefits and termination at and by Defendant;
7. Correspondence, including attachments, between Plaintiff and employees and/or representatives of Defendant including, but not limited to, emails, texts, letters, and other forms of written communication, including related or attached documents;

8. Correspondence, including attachments, amongst employees and/or representatives of Defendant related to Plaintiff's hiring; employment performance; termination at and by Defendant; the alleged hostile work environment; and Plaintiff's complaints regarding the hostile work environment;

9. Correspondence, including attachments, amongst employees and/or representatives of Defendant related to complaints Plaintiff and/or other employees made or concerns Plaintiff and/or other employees had regarding the following:

- a. Discrimination on the basis of race against non-white customers;
- b. Discrimination on the basis of race against non-white employees;
- c. Retaliation against employees who reported or complained of discrimination on the basis of race against non-white customers and/or employees;

10. Files maintained by Defendant related to any complaints of race discrimination made by employees or customers;

11. Records held by Plaintiff's current and former employer(s);

12. All parties' responses to discovery requests, including attachments;

13. Any documents and records received by any party pursuant to a subpoena served in or Freedom of Information Act Request sought related to this action;

14. All deposition transcripts, including exhibits;

15. Depositions of Akia Adams and Tyra Sapelak taken in the *Williams et. al. v. Enterprise* case;

16. Any exhibits that are identified by Defendant in its current or amended exhibit lists;

17. Any other exhibits that are identified in subsequent depositions and/or discovery requests;

18. Witness statements;

19. Any necessary rebuttal exhibits;

20. Plaintiff reserves the right to amend his Proposed Exhibit List to add or delete additional exhibits as they become known throughout discovery.

Exhibits Which May be Offered if Need Arises

1. Records held by Plaintiff's current and former employer(s);

2. Any other exhibits that are identified in subsequent depositions and/or discovery requests;

3. Any necessary rebuttal exhibits;

Dated: December 9, 2019

DEBORAH GORDON LAW

/s/ Deborah L. Gordon (P27058)

Elizabeth Marzotto Taylor (P82061)

Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing and service of said documents to all parties through their counsel of record.

DEBORAH GORDON LAW

/s/ Deborah L. Gordon (P27058)

Elizabeth Marzotto Taylor (P82061)

Attorneys for Plaintiff

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